

SCHULMANBHATTACHARYA

6116 Executive Boulevard, Suite 425, North Bethesda, Maryland 20852 240.356.8551

JEFFREY S. GAVENMAN

direct dial 240.356.8553 email jgavenman@schulmanbh.com

October 10, 2024

VIA ECF

The Honorable Katharine H. Parker
United States District Court
500 Pearl Street, Room 750
New York, NY 10007

Re: Delgado v. Donald J. Trump for President, Inc., et. al. No. 19-cv-11764 (AT)(KHP)

Dear Judge Parker:

We write respectfully on behalf of third-party witness Michael Glassner in response to the Court's October 10, 2024 orders concerning the scheduling of his deposition, and more specifically, the Court's Order requiring Mr. Glassner to explain his unavailability on the dates originally proposed by Plaintiff (the "Orders"). *See* ECF Nos. 461 and 462. To avoid any confusion, Mr. Glassner originally had meetings scheduled for the morning of October 22, 2024 and the other dates proposed by Plaintiff, and merely sought to arrange for his deposition to be taken on a date, or at a time, that would not require rearranging his schedule, and, in turn, the schedules of others that were supposed to participate in those meetings. However, in light of the Court's Orders, Mr. Glassner has rearranged his business appointments on the morning of October 22, 2024 and agreed to make himself available at 9:30am, which was the date and time originally sought by Plaintiff, rather than attempt to rearrange his schedule for five mornings in the three weeks between now and the end of the month. *See* ECF No. 459 at p. 2. To that end, I sent an e-mail to Plaintiff asking if she would agree to conduct Mr. Glassner's deposition at that time, rather than offering her five different dates. *See* Ex. A. Plaintiff responded by confirming that she would conduct Mr. Glassner's deposition on October 22, 2024, beginning at 9:30 AM, and the parties are therefore pleased to report that they have successfully negotiated the date and time of Mr. Glassner's deposition.

We thank the Court for its time and attention in this matter.

Respectfully,

/s/ Jeffrey S. Gavenman
Jeffrey S. Gavenman